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January 29, 2025

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State St.  
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080 | Deadline for Responses to ECF Nos. 397, 398, and 399

Dear Judge Singh:

Pursuant to CMO #17 [ECF 386], Defendants Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC (collectively, "CVS Caremark"); Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, "Express Scripts"); and OptumRx, Inc. (collectively, the "PBM Defendants") each intend to respond to the Letters Regarding Current Discovery Disputes Involving PBM Defendants [ECF 397], Current Discovery Disputes Involving Express Scripts [ECF 398], and Current Discovery Disputes Involving Optum [ECF 399] that Plaintiffs filed on January 28, 2025, as applicable.

The PBM Defendants each propose to respond separately to Plaintiffs' letters on or before Wednesday, February 5, 2025. If that date is acceptable, we respectfully request that you indicate the Court's approval by so ordering this letter.

Thank you for your consideration of this request and your continuing attention to this matter.

Respectfully submitted,

*/s John D. Tortorella*

John D. Tortorella

Counsel for Defendants Caremark Rx, LLC,  
Caremark LLC, and Caremark PCS Health,  
LLC

/s Jason R. Scherr

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*Counsel for Defendants Express Scripts, Inc.,  
Medco Health Solutions, Inc., and Express  
Scripts Administrators, LLC*

/s/ Thomas P. Scrivo

Thomas P. Scrivo

*Counsel for Defendant OptumRx, Inc.*

cc: Honorable Brian R. Martinotti, U.S.D.J.  
All counsel of record

SO ORDERED:

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Hon. Rukhsanah L. Singh, U.S.M.J.